

**Diamond Williams**

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**From:** Keating, Beth [BKeating@gunster.com]  
**Sent:** Monday, October 03, 2011 4:07 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Docket No. 110004-GU  
**Attachments:** 20111003160215902.pdf; Preliminary list of issues and positions 2011.DOC

Attached for electronic filing, please find the Florida City Gas's Preliminary Statement of Issues and Positions in the referenced docket.

Beth Keating  
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a. Person responsible for this electronic filing:

Beth Keating  
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b. Docket No. 110004-GU - In re: Natural Gas Conservation Cost Recovery.

c. On behalf of: Florida City Gas

d. There are a total of PDF filed: 5 pages.  
 Word file: 4 pages

e. Description: Preliminary Statement of Issues and Positions



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**GUNSTER**  
FLORIDA'S LAW FIRM FOR BUSINESS

Writer's Direct Dial Number: (850) 521-1706  
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October 3, 2011

**VIA E-MAIL FILINGS@PSC.STATE.FL.US**

Ms. Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 110004-GU – Natural Gas Conservation Cost Recovery Clause

Dear Ms. Cole:

Attached for electronic filing, please find the Florida City Gas's Preliminary Statement of Issues and Positions in the referenced docket. Also attached is a copy of the Preliminary Statement in Word format.

As always, thank you for your assistance with this filing, and please don't hesitate to let me know if you have any questions at all.

Sincerely,

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

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DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas )  
Conservation Cost Recovery )  
Clause )  
\_\_\_\_\_ )

Docket No. 110004-GU  
Filed: October 3, 2011

FLORIDA CITY GAS  
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS

The following is the preliminary statement of issues and positions filed on behalf of Florida City Gas, a division of Pivotal Utility Holdings, Inc.:

1. What are the final conservation cost recovery true-up amounts for the period January 2010 through December 2010?

Florida City Gas: An under-recovery of \$1,383,906, including interest.

2. What are the total conservation cost recovery amounts to be collected during the period January 2012 through December 2012?

Florida City Gas: A total of \$5,858,620.

3. What are the conservation cost recovery factors for the period January 2012 through December 2012?

Florida City Gas: The appropriate factors are:

| <u>Rate Class</u>                             | <u>Factor</u> |
|---|---------------|
| GS-1, GS-100, GS-220 (Sales & Transportation) | \$0.17120     |
| GS-600 (Sales & Transportation)               | \$0.09061     |
| GS-1200 (Sales & Transportation)              | \$0.05493     |
| GS-6k (Sales & Transportation)                | \$0.04551     |
| GS-25000 (Sales & Transportation)             | \$0.04526     |
| GS-60000 (Sales & Transportation)             | \$0.04425     |
| Gas Lights                                    | \$0.08821     |

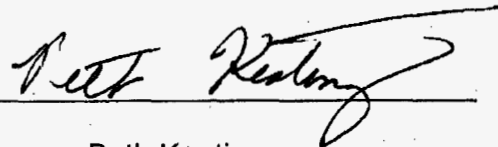
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|                                    |           |
|------------------------------------|-----------|
| GS-120000 (Sales & Transportation) | \$0.03161 |
| GS-250000 (Sales & Transportation) | \$0.02966 |

4. What should be the effective date of the conservation cost recovery factors for billing purposes?

Florida City Gas: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2012 through December 2012. Billing cycles may start before January 1, 2012 and the last cycle may be read after December 31, 2012, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

RESPECTFULLY SUBMITTED this 3rd day of October, 2011.



Beth Keating  
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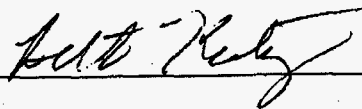
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail or U.S. Mail to the following parties of record this 3rd day of October, 2011:

|  |   |
|--|---|
| Florida Public Utilities Company<br>Cheryl Martin<br>P.O. Box 3395<br>West Palm Beach, FL 33402-3395 | MacFarlane Ferguson Law Firm<br>Ansley Watson, Jr.<br>P.O. Box 1531<br>Tampa, FL 33601-1531   |
| Messer Law Firm<br>Norman H. Horton, Jr.<br>P.O. Box 15579<br>Tallahassee, FL 32317                  | Office of Public Counsel<br>J.R. Kelly/Patricia Christensen<br>c/o The Florida Legislature<br>111 West Madison Street<br>Room 812<br>Tallahassee, FL 32399-1400 |
| Peoples Gas System<br>Paula Brown<br>P.O. Box 111<br>Tampa, FL 33601-0111                            | St. Joe Natural Gas Company, Inc.<br>Mr. Stuart L. Shoaf<br>P.O. Box 549<br>Port St. Joe, FL 32457-0549   |
| TECO Energy, Inc.<br>Javier Cuebas<br>P.O. Box 111<br>Tampa, FL 33601-0111                           | AGL Resources Inc.<br>Elizabeth Wade/David Weaver<br>Ten Peachtree Place<br>Location 1470<br>Atlanta, GA 30309  |
| Florida City Gas<br>Melvin Williams<br>933 East 25 <sup>th</sup> Street<br>Hialeah, FL 33013-3498    | Jennifer Crawford<br>Florida Public Service Commission<br>2540 Shumard Oak Boulevard<br>Tallahassee, FL 32399   |

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| Florida Division of Chesapeake<br>Utilities Corporation<br>Thomas A. Geoffroy<br>P.O. Box 960<br>Winter Haven, FL 33882-0960 |  |
| Sebring Gas System, Inc.<br>Jerry H. Melendy, Jr.<br>3515 U.S. Highway 27 South<br>Sebring, FL 33870                         |  |



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